

Keller W. Allen, WSBA No. 18794
ALLEN & McLANE, P.C.
The Paulsen Center, Suite 421
421 W. Riverside Avenue
Spokane, WA 99201
Telephone: (509) 777-2211
Facsimile: (509) 777-2215

Attorneys for Defendant
GOODRICH CORPORATION, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROY REISEN, a single person,

Plaintiff,

vs.

GOODRICH CORPORATION,
INC., a New York Corporation,

Defendant.

Case No. CV-07-294-FVS

**STIPULATED PROTECTIVE
ORDER**

It is hereby stipulated between the Plaintiff and Defendant in the
above-captioned matter that the confidentiality provisions described
herein shall govern the following information and documents that will

be provided in depositions and in response to discovery requests in this matter:

1. Any documents, information and testimony produced by a party in this action which are, in good faith, determined by the producing party to contain confidential or proprietary information, including without limitation documents and information pertaining to personnel and related files maintained by Defendant, provided it is marked or designated "Confidential".

The parties request that the Court enter an order consistent with this stipulation as follows:

2. Information, documents and testimony covered by this protective order shall not be used for any purpose except in connection with this pending action, and shall not be delivered, exhibited or disclosed to any person, except to: a) The parties to this litigation; b) Employees of counsel assisting said counsel in the preparation and trial of this matter; and c) Experts or other witnesses

with whom Plaintiff or Defendant consult in preparation for this litigation, as provided in paragraph 3.

3. Before delivery or disclosure of any information, document or testimony covered by this protective order to any expert or other witness as described in the foregoing paragraph, such persons shall be required to read a copy of this protective order and to sign a statement, in the form of Attachment A hereto, indicating that the person has read and shall abide by this order.

4. Nothing in this protective order shall prevent the use of covered material at time of hearing; on motion, including summary judgment; or in any discovery hearing. Nothing in this protective order shall be considered a waiver of any objection, or response to objection, regarding admissibility or use of covered material. If information, documents and testimony covered by the protective order are used in or in support of motions or briefs, the fact that the information, documents or testimony exist may be referred to, but the confidential information, documents or testimony shall be filed under seal. **Any confidential information filed under seal pursuant to**

this order shall state "Sealed Pursuant to Protective Order" in the heading. Should either party fail to file confidential information under seal, they may be removed from any public file and filed under seal upon the request of either party to the Court.

5. The terms of this protective order may be modified by written stipulation of the parties or the order of the Court. Either party may apply to the Court for modification or interpretation of this order by telephonic conference or written motion.

6. All documents, information and testimony, and copies thereof, covered by this protective order shall be returned to the producing party upon final conclusion of this proceeding.

Jointly Presented By:

s/ Christine M. Weaver
Christine M. Weaver, WSBA No. 20845
Attorney for Plaintiff

2/7/08
Date

s/ Keller W. Allen
Keller W. Allen, WSBA No. 18794
Attorney for Defendant

2/8/08
Date

ORDER

IT IS SO ORDERED.

DATED this 6th day of March, 2008.

s/ Fred Van Sickle
Fred Van Sickle
United States District Judge

